U.S. DISTRICT COURT DISTRICT OF VERMONT FILED

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

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UNITED STATES OF AMERICA)	DEPUTY CLERK
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v.)	
)	Criminal No. 2:18-cr-93-1-2-3
LASSINE SANGHO, a.k.a. "C,")	
KAREN NORFUL, and)	
MATTHEW REYNOLDS,)	
Defendants)	

SECOND SUPERSEDING INDICTMENT

Count 1

The Grand Jury charges:

Between in or about January 2018 and in or about August 2018, in the District of Vermont and elsewhere, the defendants, LASSINE SANGHO, a.k.a. "C"; MATTHEW REYNOLDS; and KAREN NORFUL knowingly and willfully conspired to distribute heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance. With regard to LASSINE SANGHO, MATTHEW REYNOLDS, and KAREN NORFUL, each's conduct as a member of the conspiracy, including the reasonably foreseeable conduct of other members of the conspiracy, involved 280 grams or more of a mixture or substance containing a detectable amount of cocaine base.

(21 U.S.C. §§ 841(a), 846, 841(b)(1)(A))

Count 2

The Grand Jury further charges:

On or about August 2, 2018, in the District of Vermont, the defendants, LASSINE SANGHO, a.k.a. "C," and KAREN NORFUL, knowingly and intentionally possessed with intent to distribute 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), 18 U.S.C. § 2)

Count 3

The Grand Jury further charges that:

On or about August 1, 2018, in the District of Vermont, the defendant, MATTHEW REYNOLDS, knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

A TRUE BILL

FOREPERSON

CHRISTINA E. NOLAN (PJV)

United States Attorney Burlington, Vermont January 10, 2019